

**Before the
Federal Communications Commission
Washington, DC 20554**

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| In the Matter of |) | |
| |) | |
| Federal-State Joint Board on Universal |) | |
| Service Seeks Comment on Review of |) | CC Docket No. 96-45 |
| The Definition of Universal Service |) | |

COMMENTS OF THE ALLIANCE FOR PUBLIC TECHNOLOGY

The Alliance for Public Technology (APT) welcomes the opportunity to comment on the definition of universal service and particularly on the question of whether to include advanced telecommunications services within the definition. APT is a nonprofit organization comprised of public interest groups and individuals that have been advancing the need for ubiquitous deployment of advanced telecommunications services throughout our nation for more than a decade.

APT firmly believes in the principles of universal service and that the mission of the fund is ongoing and evolving. Universal service has brought basic telecommunications services to millions of Americans who otherwise would not have been able to access them. This must be the continuing goal of the fund. As universal service brings basic functions to all Americans, APT believes that it is contributing to the goals of Section 706 of the Telecommunications Act of 1996. Section 706 calls for the deployment of advanced services to all Americans in a reasonable and timely fashion. These advanced services, however, are predicated on the existence of an affordable first connection to the home. Universal service is bringing this first access point to

telecommunications services. From here, it is essential to study universal service funding mechanisms to determine their ability to subsidize advanced services in the future.

Part of this study and planning for future uses of universal service funds for advanced services is examination of high cost areas. These areas where basic services were slow to deploy because of high cost and little return on investment will have the same problems with advanced services. The use of universal service subsidies to ensure rural and remote build out should be carefully planned and monitored so that the technology deployed today is capable of upgrades that will lead to advanced services at a later date.

Universal service must be prepared to bring advanced telecommunications services to all Americans. The life-enhancing applications of broadband technology have the potential to: bring better and more affordable health care to all citizens; expand educational opportunities for lifelong learning; enable independent living for senior citizens and people with disabilities; create opportunities for jobs and economic advancement, as well as the ability to control one's own finances; make government more responsive to all citizens; and simplify access to communications technology.

In order to fully recognize these potential benefits of advanced telecommunications services, every sector of our nation must have affordable and useable access to them. The foundation for this access starts with a strong national telecommunications infrastructure, which is being fostered by universal service funds. The Commission and the Joint Board must continue to use the funds to address the needs of those Americans not served by the marketplace. APT believes that universal

service is a strong and necessary vehicle that bolsters access and helps overcome the problems of a competitive market.

All Americans stand to gain from a comprehensive universal service program. The deployment of basic telecommunications service paves the way for advanced services to reach all Americans, as is proscribed by Section 706. APT respectfully encourages the Commission and the Joint Board to identify successes and failures from the first stage of universal service and build on those experiences to ensure the goal of advanced universal service that is embodied in the Telecommunications Act.

Respectfully submitted,

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